

**Annex A: EMA’s Response to Industry Feedback on Modifications to the Regulated Supply Service (“RSS”) Code**

| S/N | EMA’s Proposed Clause  | Feedback By             | Feedback   | EMA’s Response   |
|-----|--|-------------------------|--|--|
| 1   | <p>2.2.2 Unless relieved of the obligation to do so by the Authority, a Market Support Services Licensee shall, if so required by its electricity licence, offer to provide the following market support services to or act as agent for the Transmission Licensee but shall not provide such services to the Transmission Licensee unless the parties have entered into an agreement for the provision of such services:</p> <p>(a) Arranging for the provision of transmission services to applicable consumers; and</p> <p>(b) Calculating, billing for and collecting monies owed for transmission services from users of the transmission system on behalf and as agent of the Transmission Licensee.</p> | SP Services Ltd (“SPS”) | <p>SP Services proposes to delete “or act as agent for” as SP Services is the principal and not the agent for services rendered to non-contestable consumers.</p> <p>SP Services proposes to delete the word “transmission” and reinstate “connection” as the use of “transmission” is not appropriate for non-contestable consumers.</p> <p>2.2.2 Unless relieved of the obligation to do so by the Authority, a Market Support Services Licensee shall, if so required by its electricity licence, offer to provide the following market support services to <b>or act as agent for</b> the Transmission Licensee <del>and but</del> shall not provide such services to the Transmission Licensee unless the parties have entered into an agreement for the provision of such services:</p> <p>(a) Arranging for the provision of <b>connection transmission</b> services to applicable consumers; and</p> <p>(b) Calculating, billing for and collecting monies owed for <b>connection transmission services from users of the transmission system on behalf and as agent of the Transmission Licensee.</b></p> | <p>EMA’s original phrasing for this section of the RSS Code is aligned with the Market Support Services (“MSS”) Code (specifically section 2.2.1). We have assessed that the phrasing reflects the current and correct intent and will there retain it.</p> <p>For clarity, EMA will insert the following definition of “transmission services” as adopted in the MSS Code:</p> <p>1.3.1 <b>“transmission services” means services relating to access to and use of the transmission system;</b></p> |

| S/N | EMA's Proposed Clause  | Feedback By | Feedback  | EMA's Response   |
|-----|--|-------------|---|--|
| 2   | <p>4.2.5 A Market Support Services Licensee may direct the Transmission Licensee to discontinue the flow of electricity to such installation, and, in the case of a consumer whose installation receives a supply of electricity via the internal electrical system of another consumer, direct such other consumer to discontinue the supply of electricity to a non-contestable consumer for failure of the person to provide reasonable security, as described in section 11, for the payment of all money that may become due for regulated supply service or where any such security given by that person has become invalid or insufficient and a notice requiring that person to provide security given in accordance with section 23(3) of the Act has been given and has expired.</p> | SPS         | <p>SP Services proposes to align with the language used in Clause 4.2.3 as indicated in blue below.</p> <p>4.2.5 A Market Support Services Licensee may direct the Transmission Licensee to discontinue the flow of electricity to such installation, and, in the case of a consumer whose installation receives a supply of electricity via the internal electrical system of another consumer, <b>may direct such other consumer to</b> discontinue the supply of electricity to a non-contestable consumer for failure of the person to provide reasonable security, as described in section 11, for the payment of all money that may become due for regulated supply service or where any such security given by that person has become invalid or insufficient and a notice requiring that person to provide security given in accordance with section 23(3) of the Act has been given and has expired.</p> | <p>EMA agrees with the comment and will amend this section as follows:</p> <p>4.2.5 A Market Support Services Licensee may direct the Transmission Licensee to discontinue the flow of electricity to such installation, and, in the case of a consumer whose installation receives a supply of electricity via the internal electrical system of another consumer, <b>may</b> direct such other consumer to discontinue the supply of electricity to a non-contestable consumer for failure of the person to provide reasonable security, as described in section 11, for the payment of all money that may become due for regulated supply service or where any such security given by that person has become invalid or insufficient and a notice requiring that person to provide security given in accordance with section 23(3) of the Act has been given and has expired.</p> |
| 3   | <p>4.3.1 If a Market Support Services Licensee has, in the case of a non-contestable consumer whose installation is connected to the transmission system, directed the Transmission Licensee to discontinue the flow of electricity to such installation, and, in the case of a non-contestable consumer whose installation receives a supply of electricity via the internal electrical system of another consumer, directed such other consumer</p>  | SPS         | <p>SP Services proposes to align with the language used in Clause 4.2.3 as indicated in blue below.</p> <p>4.3.1 If a Market Support Services Licensee has, in the case of a non-contestable consumer whose installation is connected to the transmission system, directed the Transmission Licensee to discontinue the flow of electricity to such installation, and, in the case of a non-contestable consumer whose installation receives a supply of electricity via the internal</p>   | <p>EMA agrees with the comment and will amend this section as follows:</p> <p>4.3.1 If a Market Support Services Licensee has, in the case of a non-contestable consumer whose installation is connected to the transmission system, directed the Transmission Licensee to discontinue the flow of electricity to such installation, and, in the case of a non-contestable consumer whose installation receives a supply of electricity via the internal electrical system of another consumer,</p>  |

| S/N | EMA's Proposed Clause   | Feedback By | Feedback   | EMA's Response   |
|-----|---|-------------|--|--|
|     | <p>to discontinue the flow of electricity to such installation, under section 4.2.3 for reasons other than a default by the consumer and the conditions under which the Market Support Services Licensee made such a direction have changed such that the cause for disconnection is no longer applicable, the Market Support Services Licensee shall direct the Transmission Licensee to reconnect the supply of electricity to such installation, and, in the case of a consumer whose installation receives a supply of electricity via the internal electricity system of another consumer, direct such other consumer to reconnect the supply of electricity to such installation, within a reasonable time after a request from the non-contestable consumer to reinstate the connection.</p> |             | <p>electrical system of another consumer, <del>directed such other consumer to</del> discontinued the flow of electricity to such installation, under section 4.2.3 for reasons other than a default by the consumer and the conditions under which the Market Support Services Licensee made such a direction have changed such that the cause for disconnection is no longer applicable, the Market Support Services Licensee <del>shall</del> <b>may</b> direct the Transmission Licensee to reconnect <b>the supply of electricity to such installation, and, in the case of a consumer whose installation receives a supply of electricity via the internal electricity system of another consumer, may direct such other consumer to reconnect the supply of electricity to such installation, or as the case may be, reconnect supply to the installation which has been disconnected</b> within a reasonable time after a request from the non-contestable consumer to reinstate the connection.</p> | <p>directed such other consumer to discontinue the flow of electricity to such installation, under section 4.2.3 for reasons other than a default by the consumer and the conditions under which the Market Support Services Licensee made such a direction have changed such that the cause for disconnection is no longer applicable, the Market Support Services Licensee <del>may shall</del> direct the Transmission Licensee to reconnect the supply of electricity to such installation, and, in the case of a consumer whose installation receives a supply of electricity via the internal electricity system of another consumer, <del>may</del> direct such other consumer to reconnect the supply of electricity to such installation, within a reasonable time after a request from the non-contestable consumer to reinstate the connection.</p> |
| 4   | <p>4.3.2 Where a Market Support Services Licensee has, in the case of a non-contestable consumer whose installation is connected to the transmission system, directed the Transmission Licensee to discontinue, and, in the case of a non-contestable consumer whose installation receives a supply of electricity via the internal electrical system of another consumer, directed such other consumer</p>   | SPS         | <p>SP Services proposes to align with the language used in Clause 4.2.3 as indicated in <b>blue</b> below.</p> <ul style="list-style-type: none"> <li>4.3.2 Where a Market Support Services Licensee has, in the case of a non-contestable consumer whose installation is connected to the transmission system, directed the Transmission Licensee to discontinue, and, in the case of a non-contestable consumer whose installation</li> </ul>  | <p>EMA agrees with the comment and will amend this section as follows:</p> <p>4.3.2 Where a Market Support Services Licensee has, in the case of a non-contestable consumer whose installation is connected to the transmission system, directed the Transmission Licensee to discontinue, and, in the case of a non-contestable consumer whose installation receives a supply of electricity via the internal electrical system of</p>  |

| S/N | EMA's Proposed Clause   | Feedback By | Feedback   | EMA's Response   |
|-----|---|-------------|--|--|
|     | <p>to disconnect the supply of electricity to any installation of a regulated supply service consumer under section 4.2.3 by reason of a default by the consumer, the Market Support Services Licensee shall direct the Transmission Licensee to reconnect the supply of electricity to such installation, and, in the case of a consumer whose installation receives a supply of electricity via the internal electricity system of another consumer, direct such other consumer to reconnect the supply of electricity to such installation if the consumer has:</p> <p>(a) made good the default;</p> <p>(b) paid the reasonable expenses of disconnecting and reconnecting the supply;</p> <p>(c) given such security as the Market Support Services Licensee may reasonably require; and</p> <p>(d) given such security as the Transmission Licensee may reasonably require.</p> |             | <p>receives a supply of electricity via the internal electrical system of another consumer, <del>directed such other consumer to discontinued</del> the supply of electricity to any installation of a regulated supply service consumer under section 4.2.3 by reason of a default by the consumer, the Market Support Services Licensee <del>shall</del> <b>may</b> direct the Transmission Licensee to reconnect <del>the supply of electricity to such installation, and, in the case of a consumer whose installation receives a supply of electricity via the internal electricity system of another consumer, may direct such other consumer to reconnect the supply of electricity to such installation, or as the case may be, reconnect the installation</del> if the consumer has:</p> <p>(a) made good the default;</p> <p>(b) paid the reasonable expenses of disconnecting and reconnecting the supply;</p> <p>(c) given such security as the Market Support Services Licensee may reasonably require; and</p> <p>(d) given such security as the Transmission Licensee may reasonably require.</p> | <p>another consumer, directed such other consumer to disconnect the supply of electricity to any installation of a regulated supply service consumer under section 4.2.3 by reason of a default by the consumer, the Market Support Services Licensee <del>may shall</del> direct the Transmission Licensee to reconnect the supply of electricity to such installation, and, in the case of a consumer whose installation receives a supply of electricity via the internal electricity system of another consumer, <del>may</del> direct such other consumer to reconnect the supply of electricity to such installation if the consumer has:</p> <p>(a) made good the default;</p> <p>(b) paid the reasonable expenses of disconnecting and reconnecting the supply;</p> <p>(c) given such security as the Market Support Services Licensee may reasonably require; and</p> <p>(d) given such security as the Transmission Licensee may reasonably require.</p> |
| 5   | 8.5.1 A Market Support Services Licensee shall be responsible for administering the correct and timely disbursement of U-Save rebates to eligible   | SPS         | SP Services proposes to amend Clause 8.5.1 as indicated in <b>blue</b> :   | EMA will amend this section as follows to improve clarity:   |

| S/N | EMA's Proposed Clause   | Feedback By | Feedback   | EMA's Response  |
|-----|---|-------------|--|---|
|     | <p>contestable consumers and Retail Electricity Licensees, as applicable.</p> |             | <ul style="list-style-type: none"> <li data-bbox="936 236 1482 730">• A Market Support Services Licensee may inform the Retail Electricity Licensees with respect to Retail Electricity Licensees' eligibility of U-Save rebates within the reasonable timeframe as agreed with the Authority. The Market Support Services Licensee shall not be responsible for any delay or failure in performance of the foregoing obligation to the extent that such delay or failure is caused by any unforeseen circumstances beyond its control or without the fault or negligence of the Market Support Services Licensee.</li> </ul> <p data-bbox="920 778 1482 1090">The proposed code obligations are onerous for SP Services to comply. Retail Electricity Licensees are ultimately responsible to ensure correct and timely disbursement to consumers. SP Services does not determine how and when retailers choose to disburse the U-Save rebates to their customers. Retail Electricity Licensees also have a choice of whether they wish to submit the monthly file for U-Save credits.</p> <p data-bbox="920 1137 1482 1377">As the Market Support Services Licensee, SP Services is only responsible to ensure that the initial scan file is generated monthly and sent to Retail Electricity Licensees for their necessary follow up actions. However, there may be unforeseen circumstances that is not due to the fault of SP Services that prevents SP</p> | <p data-bbox="1525 236 2159 443">8.5.1. A Market Support Services Licensee shall be responsible for administering the correct and timely disbursement of U-Save rebates to eligible contestable consumers and Retail Electricity Licensees, as applicable, in accordance with the procedures prescribed by the Authority.</p> <p data-bbox="1525 491 2159 699">8.5.2. The Market Support Services Licensee shall not be responsible or liable whatsoever for any delay or failure in performing its obligations in relation to the disbursement of U-Save rebates which is beyond the control or without the fault of the Market Support Services Licensee.</p> |

| S/N | EMA's Proposed Clause   | Feedback By | Feedback  | EMA's Response   |
|-----|---|-------------|---|--|
|     |   |             | Services from doing so such as system failure, wrong source file etc.   |  |
| 6   | <p>10.1.1 A Market Support Services Licensee shall ensure that the following information is maintained for a non-contestable consumer and made available for transmittal upon receipt of a valid request:</p> <p>(a) Consumer's name and billing address;</p> <p>(b) Consumer's address for service;</p> <p>(c) Account number with the Market Support Services Licensee;</p> <p>(d) Classification of a consumer's residential status;</p> <p>(e) Classification of a consumer's premises type;</p> <p>(f) Name of the licensees whom the consumer is purchasing electricity from at the time of the request;</p> <p>(g) Classification of a consumer's eligibility to apply to cease his classification as a contestable consumer under regulation 7 of the Electricity (Contestable Consumers) Regulations;</p> <p>(h) Classification of a consumer's aggregate monthly electricity consumption based on the aggregate electricity consumption over a continuous period of 12 months ending immediately before the month of the request;</p> | SPS         | <p>SP Services would like to highlight that</p> <ul style="list-style-type: none"> <li>• Item (v) "half-hourly electricity usage" is not applicable for non-contestable consumers as they have mechanical meter.</li> <li>• Item (aa) "kVarh/half hour" is not applicable for non-AMI/MV90 meters and low tension consumers.</li> </ul> | <p>EMA agrees with the comment and will amend this section as follows:</p> <p>10.1.1 A Market Support Services Licensee shall ensure that the following information is maintained for a non-contestable consumer (where applicable) and made available for transmittal upon receipt of a valid request:</p> <p>(a) Consumer's name and billing address;</p> <p>(b) Consumer's address for service;</p> <p>(c) Account number with the Market Support Services Licensee;</p> <p>(d) Classification of a consumer's residential status;</p> <p>(e) Classification of a consumer's premises type;</p> <p>(f) Name of the licensees whom the consumer is purchasing electricity from at the time of the request;</p> <p>(g) Classification of a consumer's eligibility to apply to cease his classification as a contestable consumer under regulation 7 of the Electricity (Contestable Consumers) Regulations;</p> <p>(h) Classification of a consumer's aggregate monthly electricity consumption based on the aggregate electricity consumption over a continuous period of 12 months ending immediately before the month of the request;</p> <p>(i) Type of service connection;</p> |

| S/N | EMA's Proposed Clause   | Feedback By | Feedback | EMA's Response   |
|-----|---|-------------|----------|--|
|     | <p>(i) Type of service connection;</p> <p>(j) Voltage level at which each of the consumer's installation is connected to the grid;</p> <p>(k) Arrangement of supply at which each of the consumer's installation is connected to the grid;</p> <p>(l) Information concerning each consumer's contracted capacity, where applicable;</p> <p>(m) Information concerning each consumer's approved load, where applicable;</p> <p>(n) Type of metering scheme;</p> <p>(o) Meter identification number for each meter;</p> <p>(p) Meter type of each meter;</p> <p>(q) Meter classification of each meter type of each meter;</p> <p>(r) Mode of reading of each meter;</p> <p>(s) Meter reading frequency for each meter;</p> <p>(t) Meter reading date for each meter reading period for each meter;</p> <p>(u) Meter reading for each meter;</p> <p>(v) Electricity usage (kWh/half-hour) for each half-hour interval in each meter reading period for each meter;</p> <p>(w) Period during which the consumer is allowed to submit meter reading for settlement purposes;</p> <p>(x) Next scheduled meter read date;</p> |             |          | <p>(j) Voltage level at which each of the consumer's installation is connected to the grid;</p> <p>(k) Arrangement of supply at which each of the consumer's installation is connected to the grid;</p> <p>(l) Information concerning each consumer's contracted capacity, where applicable;</p> <p>(m) Information concerning each consumer's approved load, where applicable;</p> <p>(n) Type of metering scheme;</p> <p>(o) Meter identification number for each meter;</p> <p>(p) Meter type of each meter;</p> <p>(q) Meter classification of each meter type of each meter;</p> <p>(r) Mode of reading of each meter;</p> <p>(s) Meter reading frequency for each meter;</p> <p>(t) Meter reading date for each meter reading period for each meter;</p> <p>(u) Meter reading for each meter;</p> <p>(v) Electricity usage (kWh/half-hour) for each half-hour interval in each meter reading period for each meter;</p> <p>(w) Period during which the consumer is allowed to submit meter reading for settlement purposes;</p> <p>(x) Next scheduled meter read date;</p> <p>(y) Next scheduled invoice date;</p> <p>(z) The output of any embedded generation facility that is a GRF or GSF and that provides energy directly to the consumer's installation;</p> <p>(aa) kVarh/half-hour for each half-hour period in each meter reading period if the data is used to bill for transmission or other services;</p> |

| S/N | EMA's Proposed Clause   | Feedback By | Feedback   | EMA's Response  |
|-----|---|-------------|--|---|
|     | <p>(y) Next scheduled invoice date;</p> <p>(z) The output of any embedded generation facility that is a GRF or GSF and that provides energy directly to the consumer's installation;</p> <p>(aa) kVarh/half-hour for each half-hour period in each meter reading period if the data is used to bill for transmission or other services;</p> <p>(bb) All relevant loss adjustment factors applicable to the metered values from each meter;</p> <p>(cc) The information in the receipts issued by the Market Support Services Licensee under section 8.1.4; and</p> <p>(dd) Any information as may be required by the Authority in the discharge of its duties and responsibilities under the Act and regulations made thereunder.</p> |             |  | <p>(bb) All relevant loss adjustment factors applicable to the metered values from each meter;</p> <p>(cc) The information in the receipts issued by the Market Support Services Licensee under section 8.1.4; and</p> <p>(dd) Any information as may be required by the Authority in the discharge of its duties and responsibilities under the Act and regulations made thereunder.</p>   |
| 7   | <p>10.1.2 A Market Support Services Licensee shall ensure that the information listed in section 10.1.1 is retained for the period which the consumer is receiving regulated supply service from the Market Support Services Licensees, and no less than one year after cessation of regulated supply services from the Market Support Services Licensees, or for whatever period of time data is available if the regulated supply service consumer has been receiving supply for less than one year.</p>  | SPS         | <p>EMA's proposal for SP Services to retain the information listed under Section 10.1.1 for an indeterminate duration is unreasonable. This will expend SP Services' efforts and resources. Other legislative provisions and statutory retention periods have different limitation periods that apply to the retention of different records and documents. Hence, SP Services proposes that either:</p> <p>(1) the existing retention period under Clause 10.1.2 to remain unchanged; or</p> | <p>EMA agrees with the feedback and will amend this section as follows:</p> <p>10.1.2 A Market Support Services Licensee shall ensure that the information listed in section 10.1.1 is retained for <del>a the</del> <b>period of at least seven years from the date such information is collected by the Market Support Services Licensee which the consumer is receiving regulated supply service from the Market Support Services Licensees, and no less than one year after cessation of regulated supply services from the Market Support Services Licensees, or for</b></p> |

| S/N | EMA's Proposed Clause  | Feedback By | Feedback  | EMA's Response  |
|-----|--|-------------|---|---|
|     |  |             | <p>(2) if the existing retention period is required to be changed, then the retention period should have a specific term rather than an indefinite term starting from the consumer receiving the regulated supply services from SP Services, e.g. if a consumer receives services from SP Services for more than 15 years, it is unreasonable to require SP Services to retain such consumer's information continuously at least for 15 years.</p> <p>Any change to this Section should not retroactively apply to those consumers who have been receiving regulated supply services from SP Services before this Amended MSS Code becomes effective.</p> | <p><del>whatever period of time data is available if the regulated supply service consumer has been receiving supply for less than one year.</del></p>  |
| 8   | <p>10.2.2 A Market Support Services Licensee shall not give effect to a request referred to in section 10.2.1 unless a match is obtained for the following information provided by the consumer in the request and the information in the Market Support Services Licensee's records for the consumer:</p> <p>(a) Consumer's account number with the Market Support Services Licensee to which the request relates; and</p> <p>(b) Consumer's name and billing address to which the request relates.</p> | SPS         | <p>SP Services would like to highlight that information shared on the self- service portal is not retrieved based on consumer's name and billing address. Information is shared when retailer retrieves a consumer record by matching postal code and unit number if available.</p>   | <p>Section 10.2.2 is in relation to a consumer requesting for access to the consumer information listed in section 10.2.1. A retailer's request to access the consumer information is separately covered in section 14 (Self-Service Portal).</p> |

| S/N | EMA's Proposed Clause  | Feedback By | Feedback   | EMA's Response  |
|-----|--|-------------|--|---|
| 9   | <p>14.1 A Market Support Services Licensee shall ensure that the Self-Service Portal and associated procedures shall provide minimally the following:</p> <p>(a) Upon the Retail Electricity Licensee provision of an existing or prospective consumer's unique identifier(s) as specified by the Authority, allow each Retail Electricity Licensee to access the consumer information specified in sections 10.1.1(c) through 10.1.1(d), sections 10.1.1(i) through 10.1.1(k), section 10.1.1(n), sections 10.1.1(p) through 10.1.1(r), and sections 10.1.1(w) through 10.1.1(x);</p> <p>(b) Upon the Retail Electricity Licensee provision of an existing consumer's unique identifier(s) as specified by the Authority, allow each Retail Electricity Licensees to access the consumer information specified in sections 10.1.1(e) through 10.1.1(f), section 10.1.1(l), and sections 10.1.1(u) through 10.1.1(v);</p> <p>(c) Upon the Retail Electricity Licensee provision of a prospective consumer's unique identifier(s) as specified by the Authority, allow each Retail Electricity Licensees to access the consumer information specified in sections 10.1.1(e)</p> | SPS         | SP Services would like to highlight that the wrong reference is used for Section 14.1 (d). It should refer to "14.1 (a) through 14.1 (c)" and not "19.1.2 (a) through 19.1.2(c). | <p>EMA will amend as follows to reference the sub-sections:</p> <p>14.1 A Market Support Services Licensee shall ensure that the Self-Service Portal and associated procedures shall provide minimally the following:</p> <p>(a) Upon the Retail Electricity Licensee provision of an existing or prospective consumer's unique identifier(s) as specified by the Authority, allow each Retail Electricity Licensee to access the consumer information specified in sections 10.1.1(c) through 10.1.1(d), sections 10.1.1(i) through 10.1.1(k), section 10.1.1(n), sections 10.1.1(p) through 10.1.1(r), and sections 10.1.1(w) through 10.1.1(x);</p> <p>(b) Upon the Retail Electricity Licensee provision of an existing consumer's unique identifier(s) as specified by the Authority, allow each Retail Electricity Licensees to access the consumer information specified in sections 10.1.1(e) through 10.1.1(f), section 10.1.1(l), and sections 10.1.1(u) through 10.1.1(v);</p> <p>(c) Upon the Retail Electricity Licensee provision of a prospective consumer's unique identifier(s) as specified by the Authority, allow each Retail Electricity Licensees to access the consumer information specified in sections 10.1.1(e) through 10.1.1(f), section 10.1.1(l), and sections 10.1.1(u)</p> |

| S/N | EMA's Proposed Clause   | Feedback By | Feedback | EMA's Response   |
|-----|---|-------------|----------|--|
|     | <p>through 10.1.1(f), section 10.1.1(l), and sections 10.1.1(u) through 10.1.1(v), subject to obtaining the relevant consumer's consent;</p> <p>(d) Maintain an audit database that contains a record of the time, date and identifier of every request made by a Retail Electricity Licensee to access the information specified in sections 19.1.2(a) through 19.1.2(c);</p> <p>(e) Provide access to technical support for all Retail Electricity Licensee from 0900 to 1700 hours on business days; and</p> <p>(f) Maintain accurate system documentation and operating procedures.</p> |             |          | <p>through 10.1.1(v), subject to obtaining the relevant consumer's consent;</p> <p>(d) Maintain an audit database that contains a record of the time, date and identifier of every request made by a Retail Electricity Licensee to access the information specified in sections <del>1419</del>.1.2(a) through <del>1419</del>.1.2(c);</p> <p>(e) Provide access to technical support for all Retail Electricity Licensee from 0900 to 1700 hours on business days; and</p> <p>(f) Maintain accurate system documentation and operating procedures.</p> |